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13 Attorneys for Defendant

14 CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 GREENCYCLE PAINT, INC., a California
18 corporation,

19 Petitioner,

20 v.

21 PAINTCARE, INC., a Delaware corporation;
22 CLEAN HARBORS ENVIRONMENTAL
23 SERVICES, INC.; a Massachusetts
24 corporation; STERICYCLE
25 ENVIRONMENTAL SOLUTIONS, INC., a
26 Delaware corporation; and ROES 1-10,

27 Defendants.

No. 3:15-cv-04059-MEJ
[Alameda County Superior Court
Action No. RG15780515]

**DECLARATION OF ROHIT A.
SABNIS IN SUPPORT OF
DEFENDANT CLEAN HARBORS
ENVIRONMENTAL SERVICES,
INC.'S MOTION FOR SUMMARY
JUDGMENT**

Date: June 14, 2018

Time: 10:00 a.m.

Judge:

Magistrate Judge Maria-Elena James

Complaint Filed: August 4, 2015

CHES' Removal Filed: September 4, 2015

Trial Date: October 29, 2018

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1 I, Rohit A. Sabnis, declare:

2 1. I am an attorney licensed to practice before all courts in the State of California. I
3 am a member with the law firm of Burnham Brown, counsel for Defendant CLEAN HARBORS
4 ENVIRONMENTAL SERVICES, INC. ("Defendant") in this action. The following is based on
5 my personal knowledge and, if called as a witness, I could and would testify competently
6 thereto.

7 2. Attached as Exhibit A is a true and correct copy of Plaintiff's First Amended
8 Complaint.

9 3. Attached as Exhibit B is a true and correct copy of the Court's Order on Motions
10 to Dismiss First Amended Complaint.

11 4. Attached as Exhibit C is a true and correct copy of Clean Harbors' Interrogatories
12 to Plaintiff.

13 5. Attached as Exhibit D is a true and correct copy of Plaintiff's Responses to Clean
14 Harbors' Interrogatories to Plaintiff.

15 6. Attached as Exhibit E is a true and correct copy of pertinent portions of the
16 deposition transcript of Alan Beilke taken in this matter.

17 7. Attached as Exhibit F is a true and correct copy of pertinent portions of the
18 deposition transcript of Fred Gabriel taken in this matter.

19 8. Attached as Exhibit G is a true and correct copy of pertinent portions of the
20 deposition transcript of Curt Lock taken in this matter.

21 9. Attached as Exhibit H is a true and correct copy of pertinent portions of the
22 deposition transcript of Mike Platt taken in this matter.

23 10. Attached as Exhibit I is a true and correct copy of pertinent portions of the
24 deposition transcript of Marjaneh Zarrheparvar taken in this matter.

25 11. Attached as Exhibit J is a true and correct copy of pertinent portions of the
26 deposition transcript of Glen Dillman taken in this matter.

27 12. Attached as Exhibit K is a true and correct copy of pertinent portions of the
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1 deposition transcript of Lisa Cherri Taylor taken in this matter.

2 13. Attached as Exhibit L is a true and correct copy of pertinent portions of the
3 deposition transcript of Marc Winkler taken in this matter.

4 14. Attached as Exhibit M is a true and correct copy of pertinent portions of the
5 deposition transcript of Jerry Noel taken in this matter.

6 15. Attached as Exhibit N is a true and correct copy of pertinent portions of the
7 deposition transcript of Raymond Fernando taken in this matter.

8 16. Attached as Exhibit O is a true and correct copy of pertinent portions of the
9 deposition transcript of David Sunding taken in this matter.

10 17. Attached as Exhibit P is a true and correct copy of pertinent portions of the
11 deposition transcript of Julie Knox taken in this matter.

12 18. Attached as Exhibit Q is a true and correct copy of the expert report of Raymond
13 Fernando.

14 19. Attached as Exhibit R is a true and correct copy of the expert report of David
15 Sunding.

16 20. Attached as Exhibit S is a true and correct copy of the rebuttal expert report of
17 David Sunding.

18 21. Attached as Exhibit T is a true and correct copy of the Exhibit 3.2 from the
19 Expert Report of Julie Knox.

20 22. Attached as Exhibit U is a true and correct copy of documents identified in
21 Plaintiff's Responses to Clean Harbors' Interrogatory Number 3 as CHES00433-00462.

22 **23. Exhibit V is reserved and has intentionally not been attached to this**
23 **declaration.**

24 24. Attached as Exhibit W is a true and correct copy of GreenCycle's Response to
25 First Set of Interrogatories Propounded by Defendant PaintCare, Inc.

26 I declare under penalty of perjury under the laws of the State of California and the United
27 States of America that the foregoing is true and correct, and that this Declaration was executed
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1 on the 10th day of May, 2018, at Oakland, California.

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3 ROHIT A. SABNIS

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